

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN THE MATTER OF:  MCCLAIN FEED YARD, INC.,  Debtor.	<b>CASE NO. 23-20084-7-rlj</b>
IN THE MATTER OF:  MCCLAIN FARMS, INC.,  Debtor.	<b>CASE NO. 23-20085-7-rlj</b>
IN THE MATTER OF:  7M CATTLE FEEDERS, INC.,  Debtor.	<b>CASE NO. 23-20086-7-rlj</b>

**LIMITED OBJECTION TO RABO AGRIFINANCE’S  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

**COMES NOW** Northland Capital Financial Services, LLC. (“**Northland**”), by and through its attorneys, and for its Limited Objection to Rabo Agrifinance LLC’s (“**Rabo**”) Motion for Relief from the Automatic Stay, states as follows:

1. On or about April 28, 2023, McClain Feed Yard, Inc., McClain Farms, Inc., and 7M Cattle Feeders, Inc., (collectively “**Debtors**”) filed the above-captioned Chapter 7 cases.
2. On May 19, 2023, Rabo filed a Motion for Relief from the Automatic Stay (Doc. 29 in case no. 23-20084, Doc 34 in case no. 23-20085, Doc 31 in case no. 23-20086) which listed its interest in “any non-titled equipment or fixtures on the following lists” and the list includes several items of equipment that is owned by and secured by Northland including a 2013 Rotomix 620-16 Feed Mixer SN 810339423 mounted on a Peterbilt Semi-Tractor SN: 2NP2HN7X0DM209788, a 2008 Rotomix 620 Mixer Box SN 400887795 mounted on a 2009

International Semi Tractor SN: 1HTWAAAN29J131948, and a 2015 Rotomix 720-16 Mixer Box SN 410650339 mounted on a Kenworth Construction T370 Semi Tractor.

3. Although Rabo failed to list serial numbers in its filing, it appears likely that some of the equipment listed in Rabo's motion is secured by Northland. (Doc. 29 in case no. 23-20084, Doc 34 in case no. 23-20085, Doc 31 in case no. 23-20086).

4. Northland has a valid and protected security interest in the Equipment described herein and has first priority lien position on the equipment. ***See Ex. A-C.***

5. Rabo's Exhibit F to Doc. 29 in case no. 23-20084, Doc 34 in case no. 23-20085, Doc 31 in case no. 23-20086 appears to be an auction sale advertisement wherein it plans to sell the equipment and retain the proceeds which would be improper given Northland's interest in the equipment.

6. Northland will shortly file a Motion for Relief from Stay requesting that Northland take possession of the equipment listed herein.

7. Accordingly, Northland files this limited objection to Rabo's Motion for Relief from Stay out of an abundance of caution to preserve its lien position that is senior to Robo's interest.

WHEREFORE, Northland respectfully requests that this Court deny Rabo's Motion (Doc 34) regarding the equipment listed herein.

Respectfully submitted,

**JENKINS & KLING, P.C.**

By: /s/ Nicole E. Gorovsky  
Nicole E. Gorovsky, #51046MO  
150 North Meramec Ave., Suite 400  
St. Louis, Missouri 63105  
(314) 721-2525  
(314) 721-5525 (facsimile)  
ngorovsky@jenkinsklings.com  
*(Pro Hac Pending)*

**KESSLER COLLINS**

By: /s/ Daniel P. Callahan  
Daniel P. Callahan SBN# 03648700  
500 N. Akard Street, Suite 3700  
Dallas, Texas 75201  
(214) 379-0722  
(214) 373-4714 (Facsimile)  
[dcallahan@kesslercollins.com](mailto:dcallahan@kesslercollins.com)

**ATTORNEYS FOR NORTHLAND CAPITAL  
FINANCIAL SERVICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of June, 2023, the foregoing Objection to Rabo Motion for Relief from Stay was electronically filed through CM/ECF and all parties who registered on that platform were served through CM/ECF on June 13, 2023. I

/s/ Daniel P. Callahan  
DANIEL P. CALLAHAN